

Integrated Impact Assessment (IIA)

This Integrated Impact Assessment considers the duties and requirements of the following legislation in order to inform and ensure effective decision making and compliance:

- Equality Act 2010
- Welsh Language Standards (No.1) Regulations 2015
- Well-being of Future Generations (Wales) Act 2015
- Environment (Wales) Act 2016

Version Control

Version	Author	Job title	Date
Version 1	Rhian Headon	Equality and Engagement Officer	09.05.18
Version 2 Post consultation	Rhian Headon	Equality and Engagement Officer	17.07.18

1. Details of the initiative

Title of the Initiative: Welsh Language Promotion Strategy	
1a	Service Area: Corporate
1b	Directorate:
1c	<p>Summary of the initiative: The Strategy aims to</p> <ul style="list-style-type: none"> • Put steps in place to slow down in the short term the percentage decrease in the number of Welsh speakers in the County Borough • Increase the number of Welsh speakers in the County Borough • Increase the usage of the Welsh language in all aspects of life • Raise awareness of the language as a component of Neath Port Talbot's heritage, culture, tourism and business sectors • To drive and support Welsh medium education and the creation of new Welsh medium schools in particular, primary schools through an effective Welsh Education Strategic Plan (WESP) <p>The strategy is developed under the Welsh Language Standards (No1) Regulations 2015 - standard 145</p>

1d	<p>Who will be directly affected by this initiative?</p> <table border="0"> <tr> <td>Residents of the County Borough</td> <td>Employees of the Council</td> </tr> <tr> <td>Schools – pupils and staff</td> <td>3rd sector organisations</td> </tr> <tr> <td>Elected Members</td> <td>Community/Town Councils</td> </tr> <tr> <td>Businesses</td> <td></td> </tr> </table>	Residents of the County Borough	Employees of the Council	Schools – pupils and staff	3 rd sector organisations	Elected Members	Community/Town Councils	Businesses	
Residents of the County Borough	Employees of the Council								
Schools – pupils and staff	3 rd sector organisations								
Elected Members	Community/Town Councils								
Businesses									
1e	<p>When and how were people consulted?</p> <p>A 4 week period of public consultation took place from 25.05.18 to 22.06.18. During this period the following took place:</p> <ul style="list-style-type: none"> • A bilingual online self-completion questionnaire published on the Council’s web site • consultation packs in all council and community libraries and civic centres • Promotion and link to the consultation documents and questionnaire via email to a range of stakeholders, including local equality groups, schools, Language Forum members, elected members, Community Councils, etc. • Promotion via the Council’s corporate social media accounts messages • Promotion/consultation events were held in Port Talbot, Neath and Pontardawe • Internal newsletter – article on the strategy and action plan along with link to the consultation • Email to Senior Management Group with link • Promotion of consultation via plasma screens at civic centres 								
1f	<p>What were the outcomes of the consultation?</p> <p>17.07.18 –</p> <p>45 responses to the full consultation were received; 42 in English 3 in Welsh. Three informal ‘light touch’ consultation events were also held in Port Talbot, Neath and Pontardawe; all response were in English – although Welsh speakers were available at all venues. In addition comments were received via email from Cilybebyll Community Council.</p> <p>The majority of comments received had been addressed in the strategy/action plan, a few comments referred to areas outside of the Council’s remit e.g. a need to review the structure and grammar of the language.</p> <p>Full consultation -</p> <p>Over half of respondents (24 or 53%) agreed will all of the strategy’s aims while a further 6 (13%) agreed with some. The main reasons supporting this response were;</p> <ul style="list-style-type: none"> • Important to promote Welsh and not let it die out • Continuation of cultural identify • Welsh education will help the use of spoken Welsh for future generations 								

11 respondents (24%) disagreed with all or some of the aims. The main reasons for disagreement were:

- Public funding already limited
- English is the predominant language and 'over pushing Welsh will alienate people.
- The increase in Welsh medium education '...would create a divide between Welsh speaker and English speaking people. The aim is bilingualism ...'

The following has been raised with the education section for consideration:

A couple of responses were received which highlighted the difficulties faced by pupils with learning difficulties (similar issues faced by adults) in learning the language/within Welsh medium education. Concerns raised were in relation to difficulties faced by the complexities of the language and the limited Special Educational Needs (SEN) provision within Welsh medium education.

A large number of comments were submitted; the majority not requiring further action as were already addressed in the strategy/action plan or supporting statements, while other were outside the remit of the Council.

The following comments have been considered for inclusion in the action plan:

- History of Welsh place names
- Publicity of Welsh language training courses
- Promotion of Welsh by businesses
- Use of Welsh by elected members

All of the above will contribute positively to the aims of the strategy as well as impacting positively in relation to community cohesion, the Welsh Public Equality Duty, Welsh Language requirements, and the sustainable development element of the Wellbeing of Future Generations (Wales) Act.

2. Evidence

What evidence was used?

Language profile of the area - according to the 2011 Census, around 15.3% of the county borough's population speak Welsh 20,698 individuals. Communities such as Gwaun Cae Gurwen, Cwmllynfell and Lower Brynamman are amongst the highest percentage of Welsh speaking areas in Wales.

There has been a significant drop in the number of people speaking Welsh in these, and other areas in the county borough, between the 2001 and 2011 Census. Trebanos and Crynant have seen the largest percentage comparable change, - 20.86% and -33.47% respectively.

The latest figures from the Welsh Government indicate that there are around 1,600 (7.7%) primary school children in the county borough who speak Welsh at home but 15.2% of all children are considered fluent in Welsh. A low number of children from Welsh medium primary schools such as Cwmllynfell, Trebanos and Gwaun Cae Gurwen move on to Ysgol Gymraeg Ystalyfera for their secondary education.

Over 1,150 pupils are fully educated through the medium of Welsh at Ysgol Gymraeg Ystalyfera.

Education

Welsh medium primary school	Number of pupils (2017)
YGG Blaendulais	104
YGG Pontardawe	352
YGG Castell-nedd	387
Ysgol Gymraeg Ystalyfera (primary) – Previously YGG Y Wern	148
YGG Cwm Nedd	156
YGG Gwaun Cae Gurwen	189
YGG Rhosafan	360
YGG Tyle'r Ynn	236
YGG Cwmllynfell	86
YGG Trebanws	104

Neath Port Talbot has one Welsh-medium comprehensive school which is split between Ysgol Gymraeg Ystalyfera (north campus) and a new south campus at Ysgol Bro Dur.

Language profile of the Council - of 3626 staff, 363 (10.01%) are Welsh speakers

Ward	Number of people over 3 years of age	Number of people aged 3+ that can speak Welsh	% of people aged 3+ that can speak Welsh
Neath Port Talbot CBC	135,281	20,698	15.3
Aberavon	5,232	411	7.9
Aberdulais	2,305	311	13.5
Alltwen	2,251	664	29.5
Baglan	6,627	557	8.4
Blaengwrach	1,935	287	14.8
Briton Ferry (East)	2,827	242	8.6
Briton Ferry (West)	2,896	275	9.5
Bryn and Cwmavon	6,330	1,024	16.2
Bryncoch (North)	2,139	297	13.9
Bryncoch (South)	5,706	699	12.3
Cadoxton	1,647	211	12.8
Cimla	3,835	350	9.1
Coedffranc (Central)	3,870	425	11
Coedffranc (North)	2,322	265	11.4
Coedffranc (West)	2,563	316	12.3
Crynant	1,851	465	25.1
Cwmllynfell	1,137	669	58.8
Cymmer	2,714	186	6.9
Dyffryn	3,078	350	11.4

Ward	Number of people over 3 years of age	Number of people aged 3+ that can speak Welsh	% of people aged 3+ that can speak Welsh
Glyncorrwg	1,054	65	6.2
Glynneath	3,320	689	20.8
Godre'r Graig	1,571	473	30.1
Gwaun-cae-gurwen	2,823	1,576	55.8
Gwynfi	1,314	92	7
Lower Brynamman	1,277	776	60.8
Margam	2,908	295	10.1
Neath (East)	6,137	497	8.1
Neath (North)	3,838	379	9.9
Neath (South)	4,789	440	9.2
Onllwyn	1,161	222	19.1
Pelenna	1,113	178	16
Pontardawe	5,232	1,624	31
Port Talbot	5,457	518	9.5
Resolven	3,044	341	11.2
Rhos	2,382	588	24.7
Sandfields (East)	6,692	504	7.5
Sandfields (West)	6,495	524	8.1
Seven Sisters	2,049	469	22.9
Taibach	4,634	354	7.6
Tonna	2,445	292	11.9
Trebanos	1,367	459	33.6
Ystalyfera	2,911	1,339	46

Source : Census 2011

Public Services Board's Wellbeing Assessment (2017) –

When asked what cultural well-being means, these are the words that were mostly said (125 respondents to the on-line survey)

- 35 people were most likely to think of arts, theatre, literature, museums, cinema, film, poetry & history
- 29 people said heritage, language, traditions and beliefs, customs, Wales/ Welsh
- 17 people said sports and leisure
- 12 people said education and learning

When we asked what two things could improve levels of cultural well-being – these are the things that were mostly said (121 respondents to our on-line survey)

24 out of 121 respondents mentioned experiencing more Welsh culture and the Welsh language and 20 out of 121 respondents mentioned taking part in cultural activities

Responses received during the Corporate Plan 2018-2022 consultation held between 6th July 2017 and 8th September 2017

- Training/learning – more teaching through the medium of Welsh; more funding for Welsh language classes; more opportunities for learning and using Welsh in the community; Free taster sessions.
- Promotion opportunities – link the language to childcare, etc, bilingual service provision, intergenerational work, Welsh ambassadors - encourage businesses and community to learn and practice Welsh. Set up a social media page to help new learners
- Equality - Welsh and English not equal enough, we want more Welsh options; Both languages should have equality in this area and promoted equally; equal treatment from a lot of local retailers
- 'Welsh language provision is important but costly'
- 'Don't force people to speak Welsh'

3. Equalities

a) How does the initiative impact on people who share a protected characteristic?

Protected Characteristic	+	-	+/-	Why will it have this impact?
Age	✓	✓		<p>09.05.18</p> <p>It is anticipated that there will be a positive impact for children:</p> <ul style="list-style-type: none"> • increased opportunities to access Welsh medium preschool and 3-19 education • activities to use Welsh outside of school environment • help and support for non-Welsh speaking families to alleviate concerns and support their children
				<p>Post consultation – 17.07.18</p> <p>Issues associated with Welsh medium education for those with learning difficulties was raised during the consultation. There will be a negative impact on those pupils whose education cannot be continued in Welsh due to the inability of the system to provide for their needs. The move potentially disrupts school life, separates friendship groups, impacts on families particularly where siblings attend the same school and limits choice. All of these could have a negative effect on pupils/ families/ the 'growth' of the language and the Strategy as a whole in the long term.</p>
Disability	✓			<p>09.05.18</p> <p>It is considered that there will be a neutral impact on people with this protected characteristic</p>
		✓		<p>Post consultation – 17.07.18</p> <p>Following consultation it was considered that there could be a potential negative impact on people with learning difficulties particularly for those learning Welsh/ in Welsh medium education. The rules of Welsh grammar considered an 'inhibitor of to the future of the Welsh language' is more apparent for this group of people. Whilst the Strategy is not solely focused on the use and learning of the language these are a key focus and accessibility should be taken into account.</p>

			<p>Appropriate provision for those with Special Educational Needs (SEN) in Welsh medium education would help address this.</p> <p>Informal learning opportunities as well as consideration of accessible adult courses may help address this.</p>
Gender reassignment		✓	It is considered that there will be a neutral impact on people with this protected characteristic
Marriage & civil partnership		✓	It is considered that there will be a neutral impact on people with this protected characteristic
Pregnancy and maternity		✓	<p>09.05.18</p> <p>It is considered that there will be a neutral impact on people with this protected characteristic</p>
	✓		<p>Post Consultation – 17.07.18</p> <p>There is potential for a positive indirect impact in that increased awareness of the Welsh language, culture and services, particularly the Cylch and Meithrin groups could allay potential fears and concerns in relation to preschool education, etc.</p>
Race	✓		<p>It is anticipated that there will be a positive impact with the aim to raise awareness of the language as a component of the area's heritage and culture. It is possible that pride in the language and identity will be regenerated even if not a Welsh speaker.</p> <p>It is acknowledged that promoting the Welsh language, culture and heritage could generate negative impacts, particularly from those who are not Welsh, are non-Welsh speakers and/or those who perceive the strategy and action plan to be attracting limited resources for the benefit of a 'minority'.</p>
Religion or belief		✓	It is considered that there will be a neutral impact on people with this protected characteristic
Sex		✓	It is considered that there will be a neutral impact on people with this protected characteristic
Sexual orientation		✓	It is considered that there will be a neutral impact on people with this protected characteristic

What action will be taken to improve positive or mitigate negative impacts?

09.05.18

Consultation to be undertaken which will help confirm/ identify alternative impacts.

Post consultation -17.07.18

Work to ensure the Welsh in Education Strategic Plan includes appropriate provision to cater for the needs of all pupils

Liaise with language providers to ensure language courses are accessible as possible.

b) How will the initiative assist or inhibit the ability to meet the **Public Sector Equality Duty?**

Public Sector Equality Duty (PSED)	+	-	+/-	Why will it have this impact?
To eliminate discrimination, harassment and victimisation	✓			The Strategy is clear in tis aims to promote the Welsh language and is likely to help eliminate historic 'discrimination' due to the Welsh language services not fully recognised as equal to English services, etc.
To advance equality of opportunity between different groups	✓			The Strategy is clear in tis aims to promote the Welsh language and in so doing it is anticipated that the strategy will increase opportunities for Welsh speakers.
To foster good relations between different groups	✓			The Strategy is designed to benefit everyone, non Welsh speakers, leaners or fluent Welsh speakers. However, it is possible that the strategy could result in some resentment from non-Welsh speakers/supporters, although this should be minimal.

What action will be taken to improve positive or mitigate negative impacts?

Publicity of the strategy and its action plan will be undertaken to raise its profile. Articles/press releases/social media publicity etc will be produced to promote activities etc, when appropriate, throughout the life of the strategy

4. Community Cohesion/Social Exclusion/Poverty

	+	-	+/-	Why will it have this impact?
Community Cohesion	✓			<p>The Strategy aims to promote the Welsh language, culture and heritage and as a result it is anticipated that this would have a positive impact, especially in instilling (greater) pride in the area and Wales as a whole). The various actions would help encourage participation and so bring about a new sense of belonging and community spirit.</p> <p>However, there is a danger that the proposal could trigger disharmony and resentment amongst those non Welsh speakers or who do not support the aims of the strategy, etc,</p>
Social Exclusion			✓	<p>Little impact on either of these is anticipated however the implementation of the Strategy and associated actions could lead to more involvement of those socially excluded due to lack of Welsh language activities/opportunities.</p>
Poverty			✓	

What action will be taken to improve positive or mitigate negative impacts?
<p>Ensure that the strategy and actions are as inclusive as possible. Use publicity judiciously to promote Welsh and dispel any potential negative perceptions</p>

5. Welsh

	+	-	+/-	Why will it have this effect?
What effect does the initiative have on: – people’s opportunities to use the Welsh language	✓			The aims of the Strategy and the action plan will help provide more opportunities to use Welsh, more activities and events held in Welsh thereby increasing the number of participants and help ensure that Welsh medium education is accessible to all.
– treating the Welsh and English languages equally	✓			By implementing the strategy it is likely that the profile of Welsh language will be raised and become more visible throughout the county borough. The fulfilment of the strategy is unlikely to promote the Welsh language over English but will help raise its profile, secure its place in the county borough and promote its equal status. Treating both languages equally is a legislative requirement and the strategy and associated actions aim to help establish this.

What action will be taken to improve positive or mitigate negative impacts?

Publicity of the strategy and its action plan will be undertaken to raise its profile. Articles/press releases/social media publicity etc will be produced to promote activities etc, when appropriate, throughout the life of the strategy.

6. Biodiversity

How will the initiative assist or inhibit the ability to meet the **Biodiversity Duty**?

Biodiversity Duty	+	-	+/-	Why will it have this impact?
To maintain and enhance biodiversity			✓	There is no impact on biodiversity as a result of the strategy and action plan at this time. However, as time goes on there may be impacts, Welsh medium school extensions/new builds, etc., and these will be considered as part of the individual project.
To promote the resilience of ecosystems, i.e. supporting protection of the wider environment, such as air quality, flood alleviation, etc.			✓	

What action will be taken to improve positive or mitigate negative impacts?
No action at this time although this will be kept under review

7. Wellbeing of Future Generations

How have the five ways of working been applied in the development of the initiative?

Ways of Working	Details
i. Long term – looking at least 10 years (and up to 25 years) ahead	The Strategy is the Council’s response to the Welsh Government’s commitment to increase the number of Welsh speakers by 2050. This is a long term aim and the strategy is a step on the road to achieve this.
ii. Prevention – preventing problems occurring or getting worse	<p>The strategy and its actions have been developed with the aim to slow down further percentage decrease of Welsh speakers in the area, and to ultimately facilitate an increase in the number of Welsh speakers.</p> <p>By supporting parents, particularly non-Welsh speakers, throughout the educational journey (preschool to college), providing increased opportunities to learn and use Welsh as well as increasing understanding and knowledge of the culture and heritage, the strategy and actions aim to ‘change’ attitudes as well as increase the number of Welsh speakers.</p>
iii. Collaboration – working with other services internal or external	<p>It is not in the Council’s gift to singlehandedly influence the increase in the number of Welsh speakers nor be in a position to solely promote the language and the strategy was developed accordingly.</p> <p>A number of council services as well as partners in the voluntary sector have been identified to help deliver the aims of the strategy. Menter Iaith Castell-nedd Port Talbot has been instrumental in the development of the strategy and its actions and has ensured that the members of the Language Forum have been fully engaged through the development of the strategy.</p>
iv. Involvement – involving people, ensuring they reflect the diversity of the population	<p>The strategy and action plan were developed by a cross party elected Member Task and Finish Group with advice and support from officers of the Council and Menter Iaith CNPT. Members were able to use their personal and ward knowledge in developing the strategy.</p> <p>A four week consultation took place and a wide range of stakeholders (including public, private and voluntary partners, schools, local equality groups and staff) were consulted. 45 responses were received with an additional 79 people responding to a ‘light touch’ consultation at three ‘awareness events’ in the Neath, Port Talbot and Pontardawe. Please see Consultation section (section 1f) above and consultation feedback report.</p>

<p>v. Integration – making connections to maximise contribution to:</p>	<p>Links to other Council initiatives and strategies have been identified and applied wherever possible. By using what is already in place the strategy has ensured that no additional significant resources will be required in its implementation.</p>
<p>Council’s wellbeing objectives</p>	<p>The strategy supports and complements the Council’s vision for Neath Port Talbot as stated in the Corporate Plan :</p> <p>Our plan aims to help the country borough become a better place for people to live, learn and work, bring up families and enjoy their leisure activities. A place where everyone has an equal chance to get on in life</p> <p>It also supports and complements the Council’s wellbeing objectives:</p> <ul style="list-style-type: none"> • We want all our children and young people to have the best start in life, so they can be the best they can be • Everyone participates fully in community life - socially and economically • Neath Port Talbot County Borough will be a vibrant and healthy place to live, work and enjoy recreational time.
<p>Other public bodies objectives</p>	<p>The strategy supports and complements the Public Services Board’s wellbeing objectives.</p>

9. Monitoring Arrangements

Provide information on the monitoring arrangements to:

Monitor the impact of the initiative on the Wellbeing Objectives, Equalities, Community Cohesion and Welsh Measure achievements and outcomes of the initiative.

Progress will be monitored by Cabinet and scrutinised by the relevant scrutiny committee

The impact of the strategy and progress against actions will be reported in an annual report presented to Cabinet/ Cabinet Scrutiny Committee

Measures will be developed to ensure progress is measured appropriately

10. Assessment Conclusions

Which of the following applies to the initiative?

Conclusion 1	There are no potential problems and all opportunities to maximise contribution to achieving each of the Council's wellbeing objectives and promote equality have been taken.	Continue as planned with the initiative	<input type="checkbox"/>
Conclusion 2	There are potential problems and/or missed opportunities to maximise contribution to achieving each of the Council's wellbeing objectives and promote equality. Negative impacts/conflicts in meeting other wellbeing objectives must be identified and mitigated.	Make adjustments to remove barriers or better promote equality and continue with the initiative	<input checked="" type="checkbox"/>
Conclusion 3	There is potential for negative impacts or missed opportunities to maximise contribution to achieving each of the Council's wellbeing objectives and promote equality with regard to some groups.	Justification for continuing with the initiative.	<input type="checkbox"/>
Conclusion 4	There is actual or potential unlawful discrimination. It must be stopped and removed or changed.	STOP and redraft the initiative	<input type="checkbox"/>

Explanation of Conclusion

Strategy has been developed in accordance with the legislative requirements of the Welsh language Standards (No1) Regulations and reflects the sustainable development principle of the Wellbeing of future Generations (Wales) Act 2015.

While the anticipated outcome of the Strategy will be positive, some potential negative impacts have been identified during the consultation exercise and mitigating actions have been developed to address these. In addition, it is acknowledged that potential negative impacts are likely if implementation of the Strategy is not fully achieved and/or publicity is not undertaken sensitively.

Amendments which aim to address issues/comments raised during the consultation/assessment process have been made to the Strategy and Action Plan as appropriate.

11. Actions

What actions are required in relation to obtaining further data/information, to reduce or remove negative impacts or improve positive impacts?

Action	Who will be responsible for seeing it is done?	When will it be done by?	How will we know we have achieved our objective?
Undertake consultation on the draft Welsh Language Promotion Strategy and Action Plan	Corporate Strategy / Communications & Digital Services	25 th May - 22 nd June 2018	Consultation responses received
Work to ensure the Welsh in Education Strategic Plan includes appropriate provision to cater for the needs of all pupils	Education Services	Welsh in Education Strategic Plan currently awaiting approval	Welsh in Education Strategic Plan approved
Publicise the Strategy and Action Plan during the consultation period and beyond	Corporate Strategy / Communications & Digital Services	25 th May - 22 nd June 2018 As and when required following adoption of the Strategy and Action Plan	Communication plan developed and actioned Press release issued and other media activities undertaken
Ensure that the Strategy and Action Plan are as inclusive as possible.	Corporate Strategy / Relevant Service Areas	Following consideration of responses received during the consultation	Strategy and Action Plan revised in light of responses received during the consultation
Liaise with language providers to ensure courses offer a wide range of formats and content.	Corporate Strategy / Training Section/ Menter Iaith Castell-nedd Port Talbot	September 2019	All relevant providers have been contacted and details of courses and or links are publicised on the Council's website

Action	Who will be responsible for seeing it is done?	When will it be done by?	How will we know we have achieved our objective?
Articles/press releases/social media publicity etc to be produced to promote activities	Relevant services / Corporate Strategy / Communications & Digital Services	When appropriate throughout the life of the Strategy	Articles, etc. are published in a timely manner
Measures to be developed to ensure progress is measured appropriately	Corporate Strategy Team / Relevant Service Areas	July 2019	Data is available for and reported in annual reports

12. Sign off

	Name	Position	Date
Completed	Rhian Headon	Equality and Engagement Officer	25.07.18
Signed off	Cllr Arwyn Woolcock	Chair - Members' Task and Finish Group	25.07.18